GTC, Inc – St Joe 210339

For the period January 1, 2014 through December 31, 2014, GTC Inc – St Joe , (SAC #210339) had

GTC Inc. (ST Joe) Florida/Georgia 210339 Line 510: Service Quality Reporting/Consumer Protection Rules Compliance

GTC Inc., hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with service quality and consumer protection provisions under state law. These provisions include, but are not limited to, the following: (1) maintaining a publicly-accessible website which discloses the rates, terms and conditions of service to customers in accordance with Florida requirements; (2) compliance with state consumer protection provisions relating to Customer Services as identified in the Code of State Regulations, compliance with provisions for Quality of Service as identified in the Code of State Regulations, compliance with Service Objectives as identified in the Code of State Regulations, compliance with customer Inquiry procedure as identified in the Code of State Regulations, compliance with Dispute standards as identified in the Code of State Regulations; (3) compliance with truth-in-billing requirements; and (4) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In establishing this certification in its 2005 ETC Order,1 the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." 2 The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis. In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."3

GTC Inc., d/b/a/FairPoint Communications does not have any service quality reporting requirements with the Florida Public Service Commission. The telecommunications industry was largely de-regulated on retail services in 2011. GTC Inc., d/b/a/FairPoint Communications does not have any service quality reporting requirements with the Georgia Public Service Commission.

If a customer has a concern about their FairPoint Communications' service or billing, he/she can contact repair service, technical support or customer service with information found on their statement. Customers may also contact agencies, through information posted in the phone directory, website, and tariff pages. All consumer complaints whether from Attorney Generals' offices, Public Utility Commissions, Better Business Bureaus, Federal Communications Commission and all other agencies are sent to the FairPoint Communications' Maine office via U.S. Mail or by electronic mail at consumer@fairpoint.com. The complaints are directed to the appropriate responsible Company Team member within FairPoint Communications for resolution and response to the customer.

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").
2 Id. at para. 28.



FairPoint Communications 1 Davis Farm Road Portland, ME 04103

Business Continuity Plan Overview

Introduction

FairPoint Communications, Inc. ("FairPoint") is committed to maintaining a vigilant state of disaster preparedness for the interests of our customers, stockholders, employees and other critical stakeholders.

The purpose of our Business Continuity Plan ("BCP") is to define the disaster preparedness and recovery protocols and procedures required to restore FairPoint's critical business support functions, inside and outside plant systems and operations within FairPoint's operating footprint.

BCP components detail FairPoint's procedures for preparing for and responding to an emergency situation affecting our ability to deliver core services to our customers and our ability to meet legal dictates, and regulatory requirements.

This document discusses the following:

- BCP Scope
- BCP Components
- Plan Maintenance

BCP Scope

FairPoint's business continuity response planning is concentrated on two critical operational areas:

- <u>Customer Interfacing</u> It is recognized that a "business impact" only occurs when an <u>external-interfacing</u> element is disrupted. In essence, this means that if FairPoint experiences a disruptive event, but one that does not breach the outer-shell of the FairPoint operation and interrupt critical customer services, customer product or other external end-user, then it does not have a business impact, as defined by the BCP
- Infrastructure Integrity Without critical infrastructure systems, the ability for all other FairPoint business operations (back / front office) can come to a halt. It is these infrastructure systems that provide the critical human-factor of our customer-interfacing services. Critical infrastructure would address such services / systems as, building space for staff and equipment, service utilities, telecommunications and data network, IT network, and related infrastructure based items.

The BCP has been developed to assure the continuity of critical customer interfacing services and systems should a physical incident or workforce disruption event occur, which affects:

- Information Technology ("IT")
- Administrative and Support Operations
- Inside and Outside Plant Operations
- Network Operations Center ("NOC")
- Enhanced 9-1-1 ("E-911")
- Dispatch
- Repair Center

FairPoint has developed response / recovery strategies addressing physically disruptive incidents and workforce related disruptive incidents. All response strategies are based on recovery time objectives of those department functions and critical infrastructure systems essential to sustain customer interfacing services.



FairPoint Communications 1 Davis Farm Road Portland, ME 04103

BCP Components

The BCP consists of several components:

- Operational Preparedness for Expected Events (i.e. weather related events)
- Event / Crisis Communication Plan
- Redundancy Mapping
- Department Recovery Plans
- · Information Technology Continuity Plan

The following is a brief summary of the plan components.

Operational Preparedness for Expected Events

Weather events such snow, ice and wind can negatively impact power and communications infrastructure. While this threat cannot be eliminated, FairPoint takes steps to mitigate a storm's impact through preparedness and response. Steps include:

- Pre-event planning based on information provided by National Oceanic and Atmospheric Administration ("NOAA")
- Coordinate planning and recovery efforts through state emergency management groups
- Engage supply chain vendors to delivery additional stock prior to the expected event
- Inspect, test and fuel emergency generators in anticipation of a power outage
- Reallocate / relocate staff in order to respond to the pending event

Event / Crisis Communication Plan

Communications is a key element to respond and recover business operations. Event / Crisis Communications are facilitated by FairPoint's Risk Management Team who assume the role of incident command from the onset of the event until normal operations are resumed.

FairPoint uses a dual level communication strategy as part the Event Communication Plan. The primary level is the workgroup comprised of both employees and vendors that are directly involved in the recovery work. The secondary level consists of internal interested parties made up of our Strategic Leadership Team. The role of the secondary level is to facilitate communications both internally and externally regarding the event and our path to response and recovery. For 2014, FairPoint has partnered with SunGard and will be deploying a hosted event communication platform in order increase our speed and reach of communications during an event.

Redundancy Mapping

The process of redundancy mapping reviews operations within the FairPoint organization to identify alternate facilities and work locations that can be used in the event a primary location is not accessible. Given the geographic spread of FairPoint's Northern New England footprint, capabilities exist to relocate operations from event impacted areas. Through the mapping process, FairPoint is able to identify single points of failure and develop alternative work processes.

Department Recovery Plans

Each department has developed a recovery plan based on its critical operations as they pertain to the deliverables they contribute to our customers. FairPoint has triaged the recovery efforts based on the concept of customer servicing impact. Federal and State regulatory requirements, along with E-911 needs, have a high level of consideration in addition to the business impact concerns. The BCP goal is to minimize the disruption duration as much as is practical and provide a level of risk mitigation that will maintain critical operations. The recovery plans are built around a 24hour to 72hours response plan. This methodology



FairPoint Communications 1 Davis Farm Road Portland, ME 04103

focuses on the immediate steps that need to be taken to recover functional operations within short duration events (less than 24 hours) and well as long term plans to maintain functionality during an extended event (up to, or greater than 72 hours).

IT Recovery Plan

Like most operations, FairPoint is dependent on an IT infrastructure to conduct business and serve customers. Because of its importance, FairPoint has a continuity plan established specifically for IT operations. The IT continuity plan addresses security and access control of data sites, onsite / offsite data backup methods, processes for sequencing of system(s) recoveries and ultimately the use and execution of our established Disaster Recovery Site located outside the FairPoint footprint.

Plan Maintenance and Exercising

The BCP is a so called "living" document. Updates to the plan are ongoing with changes incorporated annually at a minimum. Individual plan components are reviewed with oversight from FairPoint's Risk Management Team. In 2013, FairPoint began the process of migrating the BCP onto a cloud based solution which will allow access to the plan components from any computer, smartphone and tablet.

FCC FORM 481

Line 1010 - Voice Service Rate Comparability

The pricing of the company's voice service rate is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice, FCC DA15-470 released on April 16, 2015.

For Rates See Attachment: (700) Company Price Offerings (voice)

Form 481 Line 1210- Terms & Conditions for Lifeline Customers

GTC, Inc. provides a Lifeline Program discount for residence service for eligible low income customers. The Lifeline Program discount is applied to any month to month residence local service, package or bundle offering. The discount is intended to offset the Subscriber Line Charge and local line charge, although eligible packages and bundles may have toll calling included in the pricing for the offering.

The price list pages outlining the terms of the Lifeline Program in GTC Inc. in Florida are attached. The terms and conditions of residential basic local exchange service, package and bundle offerings can be found at http://www.tariffs.net/fairpoint/tier.asp?cid=1644.

Form 481 Line 1210- Terms & Conditions for Lifeline Customers

GTC, Inc. d/b/a FairPoint Communications Issued By: Mike T. Skrivan Vice President - Regulatory Florida Price List No. 1 Section 3 Second Revised Page 105 Cancels First Revised Page 105 EFFECTIVE: August 1, 2012

GENERAL SERVICES PRICE LIST

BASIC LOCAL EXCHANGE SERVICE

3.11 OPERATOR ASSISTED LOCAL CALLS (cont'd.)

3.11.3 (cont'd,

- E. (cont'd.)
 - 2. Emergency Calls to reconginzable authorized civil agencies.
 - 3. Those cases where a Company operator provides assistance to:
 - (a) Re-establish a call which has been interrupted after the called number has been reached.
 - (b) Reach the called telephone where facility problems prevent customer dial completion.
 - (c) Place a non-coin sent-paid call for a calling party who identifies himself as being handicapped and unable to dial the call because of his handicap.

3.12 LIFELINE ASSISTANCE

A. General

1. The Interstate Subscriber Line Charge Waiver and Matching Program adopted by the Florida Public Service Commission is a Lifeline Assistance Program and provides for a federal credit equal to \$9.25 plus \$3.50 as mandated by the Florida Public Service Commission. The federal and Company credits are applied to the local service bills for qualified residential customers who apply for the credits and participate in at least one of the following programs: Supplemental Security Income (SSI), Supplemental Nutrition Assistance (SNAP), Medicaid, Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Temporary Assistance to Needy Families or the National School Lunch Program's Free Lunch Program.

In addition, Residential customers with household income at or below 135% of the Federal Poverty Guidelines for that household size may also qualify for Lifeline Assistance.

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Form 481 Line 1210- Terms & Conditions for Lifeline Customers

GTC, Inc. d/b/a FairPoint Communications Issued By: Mike T, Skrivan Vice President – Regulatory Affairs Florida Price List No. 1 Section 3 First Revised Page 106 Cancels Original Page 106 EFFECTIVE: June 1, 2012

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GENERAL SERVICES PRICE LIST

BASIC LOCAL EXCHANGE SERVICE

3.12 LIFELINE	ASSISTANCE	(cont'd)
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A. General (cont'd)

1. (cont'd)

Lifeline Assistance is available for one residence telephone line per household, at the customer's principal place of residence.

The Secondary Service Order Charge will be waived for existing customers changing to the Lifeline Assistance program.

Vacation service is not applicable to lines with Lifeline Assistance.

2. Applications and Regulations

Guidelines for implementation of this program are as follows:

- (a) Certification Procedures
 - All applications for this service are subject to verification periodically as required by the customer or with the state agency responsible for administration of the qualifying program.
- (b) Processing Procedures

The Company will process all applications and apply the appropriate credit on the subscriber's monthly bill.

- (c) Verification Procedures
 - The Company will reconcile and confirm eligibility periodically as required. The credit will be discontinued on the bill following written notification to the subscriber of ineligibility.
- (d) The secondary service order charge described in Section 4 does not apply when an existing customer converts their service to Lifeline Assistance.
- (e) Subscribers of Lifeline may request toll blocking at no charge, in lieu of a deposit.
- (f) Subscribers of Lifeline will not be disconnected for non-payment of toll charges.
- (g) LECs will not refuse to connect, reconnect, or provide Lifeline service because of unpaid toll charges service.

Form 481 Line 1210- Terms & Conditions for Lifeline Customers

GTC, Inc. d/b/a FairPoint Communications Issued By: R. Mark Ellmer Director, Support Revenues Florida Price List No. 1 Section 3 Original Page 107

EFFECTIVE: February 15, 2012

GENERAL SERVICES PRICE LIST

BASIC LOCAL EXCHANGE SERVICE

3.12 LIFELINE ASSISTANCE (cont'd)

A. General (cont'd)

- 2. Applications and Regulations (cont'd)
 - (h) LECs may require payment arrangements to be made for outstanding debt associated with basic local service and associated taxes and fees. Such arrangements will be made in a manner consistent with the company's Price List. If there are no written provisions, payment arrangements are to be made for a period of not less than four months.
 - (i) LECs will not require payment arrangements to be made on other unpaid amounts as a condition of receiving basic local service. This provision should not preclude LECs from collecting other portions of the outstanding debt by using any other methods as are customary for non-Lifeline subscribers.
 - (j) Any payment made by the customer on the past-due amount will first be credited to unpaid basic local service charges.
 - (k) If a Lifeline customer fails to pay charges for basic local service, the customer's Lifeline service may be disconnected. The customer will then be treated in the same manner as any other existing Lifeline subscriber with regard to reconnection after a disconnect for nonpayment; i.e., if Lifeline customers are required to pay outstanding basic local service charges before reconnection, this provision would apply to all Lifeline customers equally regardless of previous outstanding debts.
 - (i) LECs may decline to provide other local services, including ancillary services, if the customer has outstanding debt for local service. Such service may not be declined for nonpayment of toll service.

Form 481 Line 1210- Terms & Conditions for Lifeline Customers

GTC, Inc. d/b/a FairPoint Communications Issued By: R. Mark Ellmer Director, Support Revenues Florida Price List No. 1 Section 3 Original Page 108

EFFECTIVE: February 15, 2012

GENERAL SERVICES PRICE LIST

BASIC LOCAL EXCHANGE SERVICE

3.12 LIFELINE ASSISTANCE (cont'd)

- A. General (cont'd)
 - 2. Applications and Regulations (cont'd)
 - (m) LECs may require toll blocking if the customer has prior unpaid toll charges.
 - (n) For customers subject to mandatory toll blocking as a result of unpaid toll charges, LECs may require payment of all unpaid toll charges and an adequate deposit prior to the removal of toll blocking.
 - (o) LECs will publicize the availability of Lifeline for customers with prior unpaid bills in the same manner as they publicize Lifeline in general. In particular, companies are required to include information about Lifeline in their directories and provide a bill message/insert on an annual basis, pursuant to FPSC Order No. PSC-97-1262-FOF-TP, in Docket No. 970744-TP, issued October 14, 1997.

3.12.1 TRANSITIONAL LIFELINE ASSISTANCE PROGRAM

A. General

Transitional Lifeline Assistance is a state program which provides a 30% reduction of the applicable monthly exchange flat rate for residential basic local service for subscribers who no longer qualify for the Lifeline Assistance Program.

B. Regulations

A Lifeline Assistance subscriber who requests this service will receive the discounted rate for a period of one (1) year from the date the subscriber ceases to be qualified for the Lifeline Assistance Program.

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3	Service Provider Identification Number			9 numeric digits	143001442	
4	Residential Local Service Charge Effective Date			mm/dd/yyyy	6/1/2015	
5	Contact Name			alpha characters	Barbara Galardo	
6	Contact Telephone Number (include area code)			9 numeric digits	2075354126	
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Printed name of authorized officer Mich	ael T. Skrivan	
	e President of Regulatory	
Title or position of authorized officer Vic		
Title or position of authorized officer Vic Telephone number of authorized officer:	(207) 535 - 4150	